

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-41
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE
TO CARLSON INTERROGATORIES DFC/USPS-101, 102 AND 113

The United States Postal Service hereby objects to the following interrogatories filed by Mr. Carlson on June 19, 2000: DFC/USPS-101 and 102. The Postal Service also objects to DFC/USPS-113, filed June 23, 2000.

DFC/USPS-101 and 102

These interrogatories follow-up on the Postal Service's April 6, 2000, response to DFC/USPS-66. Under 39 C.F.R. § 3001.26(a), follow-up interrogatories which seek clarification or elaboration of a previous interrogatory response may be filed after the initial discovery period ends; however, they must be served within seven days of receipt of the answer to the previous interrogatory, absent a showing of extraordinary circumstances. Mr. Carlson has offered no showing of any extraordinary circumstances which, arguably, prevented the filing of these follow-up questions within a week of the original response. Accordingly, the Postal Service objects to DFC/USPS-101 and 102.

DFC/USPS-113

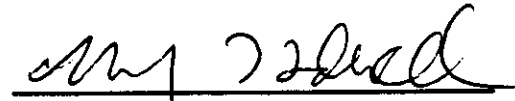
This question asks the Postal Service to perform a paper folding and envelope stuffing experiment which any intervenor in this proceeding, including Mr. Carlson, is capable of performing without expense or burden. It requires no skill, knowledge, information, judgment, expertise, materials or tools uniquely in the possession of the Postal Service or its employees and consultants. Accordingly, the Postal Service should not bear the burden of determining the answer to Mr. Carlson's inquiry.

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Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

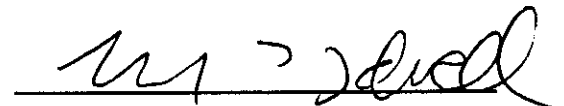
A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

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June 29, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

June 29, 2000